

COMMENTS

The enclosed supplemental amendment being filed pursuant to telephone conversations held with the Examiner on March 16th and 17th, 2005. The Applicant respectfully requests reconsideration of the present application and the allowance of claims 1-6, 28, 31-36, 40-54 and 55-70.

CONCLUSION

The presentation of new independent claims 55, 61 and 67 prompted the Examiner to request the Applicant to place these claims in better alignment with previously allowed claims 1-6, 28, 31-36 and 40-54.

The Applicant and the Examiner agreed that the Applicant's previously stated reasoning for the allowance of claims 1-6, 28, 31-36 and 40-54 over U.S. Patent No. 5,497,373 (hereinafter, "Hulen") can be used as guidance in determining the allowance of new claims 55, 61 and 67.

In the Office Action response mailed August 11, 2005, the Applicant stated

[t]he CPU of Hulen participates in the download of network service specific software to the DSPs of Hulen. (See, Hulen Col. 3, lines 16-19 and Hulen Col. 8, line 63 through Col. 9, line 9). In order to correctly participate in the downloading of the software to the DSPs, the CPU of Hulen uses "service map" information that was previously downloaded to the CPU by a "host messaging center" 14. (See, Hulen Col. 8, lines 47 - 63). Therefore Hulen perhaps teaches the downloading of service specific software to DSPs by a processor that is not a DSP (i.e., CPU 48); and, perhaps teaches the downloading to the processor that is not a DSP of information (the service map) that is used by the processor that is not a DSP to download the service specific software to the DSPs. But even if so, Hulen clearly does not teach: 1) the use of two processors on a card that are not DSPs; 2) the initialization of the card by one of the processors that are not DSPs; 3) the execution of network service specific software by the other of the processors that are not DSPs in such a manner that two different types of network service are simultaneously supported.

See, Applicant's response mailed 8/11/04, pgs. 12 – 13.

The Applicant and the Examiner verbally agreed that the amendments contained herein for independent claims 55 and 61 were sufficient for allowance in light of the above guidance, provided, that the Applicant identified sufficient support in the Applicant's specification for the points of distinction over the Hulen reference that were expressed in the 8/11/04 Office Action response.

The support is as follows.

1. With respect to "two processors on a card that are not DSPs", the discussion of Figure 3 in the Applicant's specification contains numerous references to a "first processor" 316 and a "second processor" 324 that are each distinct from "DSP modules" 302₁ – 302_N.

2. With respect to "the initialization of the card by one of the processors that is not DSPs", the Applicant's specification clearly states that the "first processor" initializes the card. For example, page 9, lines 1 – 12 of the Applicant's specification states

The first processor 316 may be configured to run the system's boot code and other firmware/software including one or more software image 200. At power-on or on hard reset, the first processor 316 downloads the boot code from boot flash memory 328 to a first local memory 318 such as an SDRAM and executes the boot code from the first local memory 318. The first processor 316 then initializes various on-board resources, such as the T1/E1 port interface 320, TDM switch 322 and other input/output (I/O) devices. Additionally, the first processor 316 maintains the base-board 301 under reset until its initialization of the various peripherals, including the T1/E1 port interface 320 and the TDM switch 322, is complete. Once initialization is complete, the first processor 316 removes the second processor 324 out of reset and allows the second processor 324 to run.

3. With respect to "the execution of network service specific software by the other of the processors that are not DSPs in such a manner that two different types of network service are [concurrently] supported", the Applicant's specification clearly refers to different network service software routines being concurrently executed to concurrently support different network services. For example, relevant portions of the Application's specification at page 7, lines 8 – 19 state

[i]n order to support different applications 202₁ . . . 202_N such as digital voice , ATM, FR or serial applications, the same feature card 20 may be used . . . [t]o process various different applications 202₁ . . . 202_N, a corresponding software image is downloaded . . . two ports may support a different type of application with the same feature card 20 . . . [f]or this scenario, two different types of software images 200₁ and 200₂ may be run on a processor that supports two different applications 200₁ and 202₂

The Applicant's specification also indicates that "the second processor" 324 (which is a processor other than the first processor) executes downloaded, network service specific software code. For example, page 11, lines 9-12 of the Applicant's specification states that

[t]he connection manager 340 invokes the proper low-level software/firmware modules (software images 200₁ . . . 200_N) which are then downloaded into local memory (318 and 326) . . . the processors execute out of their own local memory.

and page 9, lines 14-15 of the Applicant's specification states that

the second processor 324 copies code from the first local memory to its local memory 326

and page 12, lines 10-13 of the Applicant's specification states that

the connection manager 340 invokes the proper low-level software/firmware modules (software images 2001 . . . 200N) which are then downloaded into the local memory (318 and 326) . . . [t]he processors execute the code associated with the software image 200 . . .

Taken together, each these statements indicate that: 1) two different types of network service specific software code may be executed by a single processor; 2) local memory 326 receives downloaded network service specific software code; 3) local memory 326 is the memory that the second processor 326 executes code out of; and, 4) the second processor 326 executes network service specific code. The totality of these statements clearly indicate that the second processor 326 can concurrently execute different types of downloaded network service specific software code.

For these reasons the Applicant respectfully submits that independent claims 55 and 61 are consistent with the guidance provided in the Applicant's Office Action response filed 8/11/04. Independent claim 67 has herewith also been amended consistently with this guidance. Claim 1 has been amended to correct for antecedent basis errors.

If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Robert O'Rourke at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due.

Respectfully submitted,

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Date: 3/30/05



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